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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733**

November 2, 2017

Matthew Lindquist
Valero Refining - Texas LP
9701 Manchester Street
Houston, TX 77012

RE: Houston Refinery, FRP-06-TX-00155

Dear Mr. Lindquist:

This letter is to notify you that the United States Environmental Protection Agency (EPA) has approved your Facility Response Plan. All appropriate liability requirements set forth in the Clean Water Act (CWA) 311(j)(5), as amended by the Oil Pollution Act of 1990 are still applicable. This regulatory approval was based upon technical review of the plan submissions. Please be advised that EPA will continue to monitor your facility's approval status through site inspections and information validation.

If EPA determines during its next review, or during field verification, that the response plan is inadequate, or if EPA acquires information which indicates your response plan is inadequate to manage potential discharges, EPA will require appropriate revisions to your plan. Failure to make such revisions may affect your plan's approved status.

If you have any questions concerning this letter, please contact my office at 214-665-6702.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryant Smalley", is written over the typed name.

Bryant Smalley
Oil Spill & Response Team Leader,
USEPA R6 (OSF-EO)
Federal On-Scene Coordinator
(214) 665-7368 (office)

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INFILING


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FY-2017 / Insp. #:FRP-TX-2017-00076



NOTICE OF SPCC/FRP INSPECTION
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6

Date: 4/4/17	FRP Inspection Number: FRP-TX-2017-76	SPCC Inspection Number: SPCC-TX-2017-77
Lead Inspector (Print Name & Sign): Chris Perry <i>Chris Perry</i>		
Additional Inspectors:		
Facility Name: Houston Refinery	Facility Address: 9701 Manchester St, Houston TX	Facility Type: Refinery
Facility Phone: 713-923-3378	Facility Email: matt.lindquist@valero.com	Facility Fax: 713-923-3561
<p>The purpose of today's inspection is to determine compliance with Section 311 of the Clean Water Act (the "Act"), 33 U.S.C. § 1321, and the Oil Pollution Prevention regulations found at 40 C.F.R. Part 112 (the "Regulations"). The scope of the inspection and plan review process may include, but is not limited to, reviewing and obtaining copies of documents and records; interviewing facility personnel; a physical inspection of the facility (including process areas); taking photographs or video; collecting samples; and other activities necessary to determine compliance with the Act and the regulations.</p> <p>Please review this Notice of SPCC/FRP Inspection ("Notice") carefully. Note that any deficiencies identified by the inspector and communicated to you during the closing conference are the inspector's observations and not a determination of compliance.</p> <p>Please be advised that any noncompliance with the Regulations may constitute a violation under the Act for which penalties or other relief may be sought. Penalties may be assessed upon subsequent findings by the Administrator or a court that the facility has violated the Act and/or the regulations. The United States Environmental Protection Agency ("EPA") reserves its right to initiate an enforcement action under the Act and any other applicable law, to seek penalties and other appropriate relief, for any violation of the Act, the Regulations, or such other laws. This Notice and other relevant information will be reviewed by appropriate EPA personnel to determine if any deficiencies, identified in such review, constitute violations of the Act and the Regulations and whether an enforcement action is appropriate. EPA will provide written correspondence describing any deficiencies identified during the inspection.</p> <p>If deficiencies with the Regulations were identified during the inspection and communicated to you during the closing conference you are urged to correct such deficiencies as soon as possible. EPA requests you submit all information, as soon as possible, evidencing your correction of the deficiencies to:</p> <p style="text-align: center;">Chris Perry U.S. Environmental Protection Agency Perry.chris@epa.gov</p> <p>If it is not feasible to correct the deficiencies within 30 days of the date of the inspection, immediately submit a detailed explanation and schedule indicating by when the noted deficiencies will be corrected. If you believe that your facility is not required to have an SPCC and/or FRP Plan, or is in compliance with the SPCC and FRP regulatory requirements, submit an explanation, supported by documentation, as to why the facility is not subject to the SPCC and/or FRP provision of the Oil Pollution Prevention regulations at 40 C.F.R. Part 112 or meets its requirements within 30 days of the date of the inspection.</p> <p style="text-align: center;">Confidential Business Information</p> <p>For the information submitted to EPA, you may be entitled to claim it as Confidential Business Information (CBI) pursuant to the regulations set forth in 40 C.F.R. Part 2. If EPA determines the information you have designated meets the criteria in 40 C.F.R. § 2.208, the information will be disclosed only to the extent and by means of the procedures specified in 40 C.F.R. Part 2 Subpart B. Unless CBI is claimed, EPA may make the information available to the public without further notice to you.</p>		
Acknowledgement of Inspection		
Signature of Facility Representative: <i>Matthew Lindquist</i>		
Name & Title of Facility Representative: MATTHEW LINDQUIST / Environmental Engineering Manager		

FACILITY INFORMATION			
FACILITY NAME: <u>Houston Refinery</u>			
LATITUDE: <u>29.718889</u>		LONGITUDE: <u>-95.253889</u> GPS DATUM: Google Earth	
Section/Township/Range:		FRS#/OIL DATABASE ID: <u>RL-4A-155</u> ICIS#:	
ADDRESS: <u>9701 Manchester St</u>			
CITY: <u>Houston</u>		STATE: <u>Tx</u>	ZIP: <u>77012</u> COUNTY: <u>Harris</u>
MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS - IF NOT, PRINT "SAME"):			
<u>Same P.O. Box 5038</u>			
CITY: <u>Houston</u>		STATE: <u>Tx</u>	ZIP: <u>77262</u> COUNTY: <u>Harris</u>
TELEPHONE: <u>713-923-3506</u>		FACILITY CONTACT NAME/TITLE: <u>Matthew Lingvist -</u>	
OWNER NAME: <u>Valero Refining-Texas L.P.</u>			
OWNER ADDRESS: <u>P.O. Box 500</u>			
CITY: <u>San Antonio</u>		STATE: <u>Tx</u>	ZIP: <u>78212</u> COUNTY:
TELEPHONE:		FAX:	EMAIL: <u>matt.lindquist@valero.com</u>
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER - IF NOT, PRINT "SAME"): <u>same</u>			
OPERATOR ADDRESS:			
CITY:		STATE:	ZIP: COUNTY:
TELEPHONE:		OPERATOR CONTACT NAME/TITLE:	
FACILITY TYPE: <u>Refinery</u>			NAICS CODE: <u>324110</u>
HOURS PER DAY FACILITY ATTENDED: <u>24 hrs</u>		TOTAL FACILITY CAPACITY: <u>209,229,464 gal</u>	
TYPE(S) OF OIL STORED: <u>Gasoline, jet fuel, diesel, crude, No. 6 fuel oil</u>			
LOCATED IN INDIAN COUNTRY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO RESERVATION NAME:			
INSPECTION/PLAN REVIEW INFORMATION			
PLAN REVIEW DATE: <u>3/30/17</u>		REVIEWER NAME: <u>Chris Perry</u>	
INSPECTION DATE: <u>4/4/17</u>		TIME: <u>0830</u>	ACTIVITY ID NO: <u>SPCC-Tx-2017-77</u>
LEAD INSPECTOR: <u>Chris Perry</u> <u>FRP-Je</u>			
OTHER INSPECTOR(S):			
INSPECTION ACKNOWLEDGMENT			
I performed an SPCC inspection at the facility specified above.			
INSPECTOR SIGNATURE: 			DATE:
SUPERVISOR REVIEW/SIGNATURE:			DATE:

SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 U.S. gallons, OR the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons AND☒ Yes ☐ No

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States

☒ Yes ☐ No

AFFECTED WATERWAY(S):

Simms Bayou

DISTANCE:

0

FLOW PATH TO WATERWAY:

The facility is located along the Houston Ship Channel.

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)
- Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;
- Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;
- Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)
- Containers smaller than 55 U.S. gallons;
- Permanently closed containers (as defined in §112.2);
- Motive power containers (as defined in §112.2);
- Hot-mix asphalt or any hot-mix asphalt containers;
- Heating oil containers used solely at a single-family residence;
- Pesticide application equipment and related mix containers;
- Any milk and milk product container and associated piping and appurtenances; and
- Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.

Does the facility have an SPCC Plan?

☒ Yes ☐ No**FACILITY RESPONSE PLAN (FRP) APPLICABILITY—40 CFR 112.20(f)**

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

☒ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 U.S. gallons, OR☒ The facility has a total oil storage capacity of at least 1 million U.S. gallons, AND at least one of the following is true:

- ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
- ☒ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
- ☐ The facility is located such that a discharge would shut down a public drinking water intake.
- ☐ The facility has had a reportable discharge greater than or equal to 10,000 U.S. gallons in the past 5 years.

Facility has FRP: ☒ Yes ☐ No ☐ NAFRP Number: FRP-06-Tx-00155

Facility has a completed and signed copy of Appendix C, Attachment C-II, "Certification of the Applicability of the Substantial Harm Criteria."

☒ Yes ☐ No

Comments:

SPCC TIER II QUALIFIED FACILITY APPLICABILITY—40 CFR 112.3(g)(2)

The aggregate aboveground oil storage capacity is 10,000 U.S. gallons or less **AND**

☐ Yes ☒ No

In the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule (if the facility has been in operation for less than three years), the facility has **NOT** had:

- A single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, **OR**
- Two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve-month period¹

☐ Yes ☒ No

☐ Yes ☒ No

IF **YES** TO ALL OF THE ABOVE, THEN THE FACILITY IS A TIER II QUALIFIED FACILITY²
SEE ATTACHMENT D FOR TIER II QUALIFIED FACILITY CHECKLIST

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3

Date facility began operations: 1940

Date of initial SPCC Plan preparation: unknown

Current Plan version (date/number): March 2017

112.3(a) For facilities (except farms), including mobile or portable facilities:

- In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by **November 10, 2011**
- Beginning operations after November 10, 2011, Plan prepared and fully implemented before beginning operations

☒ Yes ☐ No ☐ NA

☐ Yes ☐ No ☒ NA

For farms (as defined in §112.2):

- In operation on or prior to August 16, 2002: Plan maintained, amended and implemented by **May 10, 2013**
- Beginning operations after August 16, 2002 through May 10, 2013: Plan prepared and fully implemented by **May 10, 2013**
- Beginning operations after May 10, 2013: Plan prepared and fully implemented before beginning operations

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

112.3(d) Plan is certified by a registered Professional Engineer (PE) and includes statements that the PE attests:

- PE is familiar with the requirements of 40 CFR part 112
- PE or agent has visited and examined the facility
- Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112
- Procedures for required inspections and testing have been established
- Plan is adequate for the facility

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

PE Name: Ralph Chaiet

License No.: 75161

State: TX

Date of certification: 3/3/15

112.3(e)(1)

Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office.
(Please note nearest field office contact information in comments section below.)

☒ Yes ☐ No ☐ NA

Comments:

¹ Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

² An owner/operator who self-certifies a Tier II SPCC Plan may include environmentally equivalent alternatives and/or secondary containment impracticability determinations when reviewed and certified by a PE.

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4

112.4(a),(c)	Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period? ³	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If YES	<ul style="list-style-type: none"> Was information submitted to the RA as required in §112.4(a)?⁴ Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located §112.4(c) Date(s) and volume(s) of reportable discharges(s) under this section: Were the discharges reported to the NRC⁵? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No
112.4(d),(e)	Have changes required by the RA been implemented in the Plan and/or facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

Comments:

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5

112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If YES	<ul style="list-style-type: none"> Was the Plan amended within six months of the change? Were amendments implemented within six months of any Plan amendment? 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
112.5(b)	Review and evaluation of the Plan completed at least once every 5 years? Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)? Amendments implemented within six months of any Plan amendment? Five year Plan review and evaluation documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.5(c)	Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) [Except for self-certified Plans]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

Name: <u>Eric Politte</u>	License No.: <u>77962</u>	State: <u>Tx</u>	Date of certification: <u>12/30/15</u>
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 Reason for amendment: Installation of 2 tanks and new pipe.

Comments:

³ A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

⁴ Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self certification

⁵ Inspector Note-Confirm any spills identified above were reported to NRC

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan ⁶		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed (<i>Note: Relevant for Inspection evaluation and testing baselines.</i>)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
112.7(a)(2)	The Plan includes deviations from the requirements of §§112.7(g), (h)(2) and (3), and (i) and applicable subparts B and C of the rule, <u>except the secondary containment requirements in §§112.7(c) and (h)(1), 112.8(c)(2), 112.8(c)(11), 112.12(c)(2), and 112.12(c)(11)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
If YES	<ul style="list-style-type: none"> The Plan states reasons for nonconformance Alternative measures described in detail and provide equivalent environmental protection (<i>Note: Inspector should document if the environmental equivalence is implemented in the field, in accordance with the Plan's description</i>) 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Describe each deviation and reasons for nonconformance:			

⁶ May be part of the Plan or demonstrated elsewhere.
Onshore Facilities (Excluding Oil Production)

		PLAN	FIELD		
112.7(a)(3)	Plan describes physical layout of facility and includes a diagram ⁷ that identifies: <ul style="list-style-type: none"> • Location and contents of all regulated fixed oil storage containers • Storage areas where mobile or portable containers are located • Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt") • Transfer stations • Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11) Plan addresses each of the following:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(i)	For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(ii)	Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(iii)	Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(v)	Methods of disposal of recovered materials in accordance with applicable legal requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
112.7(a)(4)	Does not apply if the facility has submitted an FRP under §112.20: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the: <table border="0"> <tr> <td> <ul style="list-style-type: none"> • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; </td> <td> <ul style="list-style-type: none"> • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted. </td> </tr> </table>	<ul style="list-style-type: none"> • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; 	<ul style="list-style-type: none"> • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted. 		
<ul style="list-style-type: none"> • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; 	<ul style="list-style-type: none"> • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted. 				
112.7(a)(5)	Does not apply if the facility has submitted a FRP under §112.20: Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA			
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA			
Comments:					

		PLAN	FIELD				
112.7(c)	<p>Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), except as provided in §112.7(k) of this section for certain qualified operational equipment. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment A of this checklist.</p> <p>For onshore facilities, one of the following or its equivalent:</p> <ul style="list-style-type: none"> Dikes, berms, or retaining walls sufficiently impervious to contain oil; Curbing or drip pans; Sumps and collection systems; Culverting, gutters or other drainage systems; Weirs, booms or other barriers; Spill diversion pond; Retention ponds; or Sorbent materials. 						
Freeboard = 10"	Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above:						
	<input checked="" type="checkbox"/> Bulk storage containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA				
	<input checked="" type="checkbox"/> Mobile/portable containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA				
	<input checked="" type="checkbox"/> Oil-filled operational equipment (as defined in 112.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA				
	<input type="checkbox"/> Other oil-filled equipment (i.e., manufacturing equipment)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA				
	<input checked="" type="checkbox"/> Piping and related appurtenances	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA				
	<input type="checkbox"/> Mobile refuelers or non-transportation-related tank cars	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA				
	<input checked="" type="checkbox"/> Transfer areas, equipment and activities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA				
<input type="checkbox"/> Identify any other equipment or activities that are not listed above:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA					
112.7(d)	<p>Secondary containment for one (or more) of the following provisions is determined to be impracticable:</p> <table border="0"> <tr> <td><input type="checkbox"/> General secondary containment §112.7(c)</td> <td><input type="checkbox"/> Bulk storage containers §§112.8(c)(2)/112.12(c)(2)</td> </tr> <tr> <td><input type="checkbox"/> Loading/unloading rack §112.7(h)(1)</td> <td><input type="checkbox"/> Mobile/portable containers §§112.8(c)(11)/112.12(c)(11)</td> </tr> </table>	<input type="checkbox"/> General secondary containment §112.7(c)	<input type="checkbox"/> Bulk storage containers §§112.8(c)(2)/112.12(c)(2)	<input type="checkbox"/> Loading/unloading rack §112.7(h)(1)	<input type="checkbox"/> Mobile/portable containers §§112.8(c)(11)/112.12(c)(11)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<input type="checkbox"/> General secondary containment §112.7(c)	<input type="checkbox"/> Bulk storage containers §§112.8(c)(2)/112.12(c)(2)						
<input type="checkbox"/> Loading/unloading rack §112.7(h)(1)	<input type="checkbox"/> Mobile/portable containers §§112.8(c)(11)/112.12(c)(11)						
If YES	<ul style="list-style-type: none"> The Impracticability of secondary containment is clearly demonstrated and described in the Plan For bulk storage containers,⁸ periodic integrity testing of containers and integrity and leak testing of the associated valves and piping is conducted 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA				
	<p>(Does not apply if the facility has submitted a FRP under §112.20):</p> <ul style="list-style-type: none"> Contingency Plan following the provisions of 40 CFR part 109 is provided (see Attachment C of this checklist) AND Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA				
Comments:							

⁸ These additional requirements apply only to bulk storage containers, when an impracticability determination has been made by the PE

		PLAN	FIELD
112.7(e) <i>Monthly</i>	Inspections and tests conducted in accordance with written procedures	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Record of inspections or tests signed by supervisor or inspector	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Kept with Plan for at least 3 years (see Attachment B of this checklist) ⁹	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
112.7(f)	Personnel, training, and oil discharge prevention procedures		
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPOG Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Person designated as accountable for discharge prevention at the facility and reports to facility management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(g)	Plan describes how to: <ul style="list-style-type: none"> Secure and control access to the oil handling, processing and storage areas; Secure master flow and drain valves; Prevent unauthorized access to starter controls on oil pumps; Secure out-of-service and loading/unloading connections of oil pipelines; and Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(h)	Tank car and tank truck loading/unloading rack ¹⁰ is present at the facility	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If YES (1)	Loading/unloading rack means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.		
	Does loading/unloading rack drainage flow to catchment basin or treatment facility designed to handle discharges or use a quick drainage system?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	(2) An interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the loading or unloading rack to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	(3) Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Comments:			

⁹ Records of inspections and tests kept under usual and customary business practices will suffice

¹⁰ Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply

		PLAN	FIELD
112.7(i)	Brittle fracture evaluation of field-constructed aboveground containers is conducted after tank repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (applies to only field-constructed aboveground containers)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
112.7(j)	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(k)	<p>Qualified oil-filled operational equipment is present at the facility¹¹</p> <p><i>Oil-filled operational equipment</i> means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.</p> <p>If YES Check which apply:</p> <p>Secondary Containment provided in accordance with 112.7(c) <input checked="" type="checkbox"/></p> <p>Alternative measure described below (confirm eligibility) <input type="checkbox"/></p>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
112.7(k)	<p>Qualified Oil-Filled Operational Equipment</p> <ul style="list-style-type: none"> Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?¹² <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <p><i>If YES for either, secondary containment in accordance with §112.7(c) is required</i></p> <ul style="list-style-type: none"> Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <p>Does not apply if the facility has submitted a FRP under §112.20:</p> <ul style="list-style-type: none"> Contingency plan following 40 CFR part 109 (see Attachment C of this checklist) is provided in Plan AND <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA 		
Comments:			

¹¹ This provision does not apply to oil-filled manufacturing equipment (flow-through process)

¹² Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

ONSHORE FACILITIES (EXCLUDING PRODUCTION) 40 CFR 112.8/112.12		PLAN	FIELD
112.8(b)/ 112.12(b) Facility Drainage			
Diked Areas (1)	Drainage from diked storage areas is: • Restrained by valves, except where facility systems are designed to control such discharge, OR • Manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Diked storage area drain valves are manual, open-and-closed design (not flapper-type drain valves)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
7 0	If drainage is released directly to a watercourse and not into an onsite wastewater treatment plant, retained storm water is inspected and discharged per §§112.8(c)(3)(ii), (iii), and (iv) or §§112.12(c)(3)(ii), (iii), and (iv).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Undiked Areas (3)	Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to facility. Catchment basin located away from flood areas. ¹³	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(4)	If facility drainage not engineered as in (b)(3) (i.e., drainage flows into ponds, lagoons, or catchment basins) then the facility is equipped with a diversion system to retain oil in the facility in the event of an uncontrolled discharge. ¹⁴	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(5)	Are facility drainage waters continuously treated in more than one treatment unit and pump transfer is needed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
If YES	<ul style="list-style-type: none"> Two "lift" pumps available and at least one permanently installed Facility drainage systems engineered to prevent a discharge as described in §112.1(b) in the case of equipment failure or human error 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Comments:			
112.8(c)/112.12(c) Bulk Storage Containers <input type="checkbox"/> NA <i>Bulk storage container</i> means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container. <i>If bulk storage containers are not present, mark this section Not Applicable (NA). If present, complete this section and Attachment A of this checklist.</i>			
(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Except for mobile refuelers and other non-transportation-related tank trucks, construct all bulk storage tank installations with secondary containment to hold capacity of largest container and sufficient freeboard for precipitation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
10"	Diked areas sufficiently impervious to contain discharged oil OR Alternatively, any discharge to a drainage trench system will be safely confined in a facility catchment basin or holding pond	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

¹³ Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

¹⁴ These provisions apply only when a facility drainage system is used for containment; otherwise mark NA

		PLAN	FIELD
(3)	Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
If YES	• Bypass valve normally sealed closed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Bypass valve opened and resealed under responsible supervision	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR §§122.41(j)(2) and (m)(3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(4)	For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281):		
	• Provide corrosion protection with coatings or cathodic protection compatible with local soil conditions	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	• Regular leak testing conducted	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(5)	The buried section of partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Sec 5.4 AP/653 UT Ext 5 Int 15-20	(6) • Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Comparison records of aboveground container integrity testing are maintained	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Container supports and foundations regularly inspected	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Records of all inspections and tests maintained ¹⁵	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Integrity Testing Standard identified in the Plan:			
112.12 (c)(6)(ii) <i>(Applies to AFVO Facilities only)</i>	Conduct formal visual inspection on a regular schedule for bulk storage containers that meet all of the following conditions:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	<ul style="list-style-type: none"> • Subject to 21 CFR part 110; • Elevated; • Constructed of austenitic stainless steel; • Have no external insulation; and • Shop-fabricated. 		
	In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections. ¹⁶	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

¹⁵ Records of inspections and tests kept under usual and customary business practices will suffice
 Onshore Facilities (Excluding Oil Production)

		PLAN	FIELD
(7)	Leakage through defective internal heating coils controlled: <ul style="list-style-type: none"> Steam returns and exhaust lines from internal heating coils that discharge into an open watercourse are monitored for contamination, <u>OR</u> Steam returns and exhaust lines pass through a settling tank, skimmer, or other separation or retention system 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(8)	Each container is equipped with at least one of the following for liquid level sensing: <ul style="list-style-type: none"> High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities; High liquid level pump cutoff devices set to stop flow at a predetermined container content level; Direct audible or code signal communication between container gauger and pumping station; Fast response system for determining liquid level (such as digital computers, telepulse, or direct vision gauges) and a person present to monitor gauges and overall filling of bulk containers; or Regularly test liquid level sensing devices to ensure proper operation. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(9)	Effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(11)	Mobile or portable containers positioned to prevent a discharge as described in §112.1(b). Mobile or portable containers (excluding mobile refuelers and other non-transportation-related tank trucks) have secondary containment with sufficient capacity to contain the largest single compartment or container and sufficient freeboard to contain precipitation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.8(d)/112.12(d) Facility transfer operations, pumping, and facility process			
(1)	Buried piping installed or replaced on or after August 16, 2002 has protective wrapping or coating Buried piping installed or replaced on or after August 16, 2002 is also cathodically protected or otherwise satisfies corrosion protection standards for piping in 40 CFR part 280 or 281 Buried piping exposed for any reason is inspected for deterioration; corrosion damage is examined; and corrective action is taken	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Piping terminal connection at the transfer point is marked as to origin and capped or blank-flanged when not in service or in standby service for an extended time	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(5)	Vehicles warned so that no vehicle endangers aboveground piping and other oil transfer operations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments: <div style="height: 40px; border: 1px solid black; margin-top: 5px;"></div>			

ATTACHMENT B: SPCC INSPECTION AND TESTING CHECKLIST

Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept by all facilities with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

Inspection or Test	Documentation		Not Applicable	
	Present	Not Present		
112.7-General SPCC Requirements				
(d)	Integrity testing for bulk storage containers with no secondary containment system and for which an impracticability determination has been made	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(h)(3)	Inspection of lowermost drain and all outlets of tank car or tank truck prior to filling and departure from loading/unloading rack	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(i)	Evaluation of field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service or has discharged oil or failed due to brittle fracture failure or other catastrophe	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k(2)(i)	Inspection or monitoring of qualified oil-filled operational equipment when the equipment meets the qualification criteria in §112.7(k)(1) and facility owner/operator chooses to implement the alternative requirements in §112.7(k)(2) that include an inspection or monitoring program to detect oil-filled operational equipment failure and discharges	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
112.8/112.12-Onshore Facilities (excluding oil production facilities)				
(b)(1), (b)(2)	Inspection of storm water released from diked areas into facility drainage directly to a watercourse	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)(3)	Inspection of rainwater released directly from diked containment areas to a storm drain or open watercourse before release, open and release bypass valve under supervision, and records of drainage events	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)(4)	Regular leak testing of completely buried metallic storage tanks installed on or after January 10, 1974 and regulated under 40 CFR 112	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)(6)	Regular integrity testing of aboveground containers and integrity testing after material repairs, including comparison records	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)(6), (c)(10)	Regular visual inspections of the outsides of aboveground containers, supports and foundations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)(6)	Frequent inspections of diked areas for accumulations of oil	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)(8)(v)	Regular testing of liquid level sensing devices to ensure proper operation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)(9)	Frequent observations of effluent treatment facilities to detect possible system upsets that could cause a discharge as described in §112.1(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)(1)	Inspection of buried piping for damage when piping is exposed and additional examination of corrosion damage and corrective action, if present	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)(4)	Regular inspections of aboveground valves, piping and appurtenances and assessments of the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)(4)	Integrity and leak testing of buried piping at time of installation, modification, construction, relocation or replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

U.S. EPA Facility Response Plan (FRP) -- Review Form

I. Facility Information

FRP Number: FRP-06-TX-00155	Facility Name: Houston Refinery	
Facility Owner: Valero Refining - Texal LP		
Facility Operator (if different from owner): same		
Mailing Address: PO Box 5038		
City: Houston	State: TX	Zip: 77262-5038
Telephone: 713-923-3506	Fax: 713-923-3505	
Latitude: 29.718889	Longitude: -95.253889	
Other Description or Directions:		
Site Location Map Attached (Y/N) : N		

INSPECTION ACKNOWLEDGMENT

I performed an FRP inspection at the facility specified above.

INSPECTOR SIGNATURE:	DATE:
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SUPERVISOR REVIEW/SIGNATURE:	DATE:
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II. Facility Overview

Date of Initial Facility Operation:	1940 and 1942 - they give 2 dates in different places		
Total Storage Capacity (bbls/gals):	209,229,464 gal	# Of Tanks: 115	
Worst Case Discharge (bbls/gals):	12,600,000 gal		
Actual Worst Case Discharge (barrels) calculated from Worst Case Discharge Worksheet	(300,000 barrels)		
Actual Worst Case Discharge (gallons) calculated from Worst Case Discharge Worksheet	(12,600,000 gallons)		
Capacity of Largest Above Ground Storage Tank (bbls/gals): 12,600,000 gal			
Name of Affected Waterway(s)/Protected Waterway(s)/Environmentally Sensitive Area (A): Houston Ship Channel, Sims Bayou			
Distance from Facility: 0- 1/4 mile			
Response Contractor(s): Clean Channel Assoc.; Garner Environ.; National Response Corp; Phoenix Pollution			
Yes	No		
X		Standard Response Plan Cover Sheet Submitted with Plan.	

X		Emergency Response Action Plan Submitted with Plan or as Separate Part of Plan.
X		Facility Response Plan Follows 40 CFR 112 Appendix F Format.

III. FRP Applicability [40 CFR 112.20 (f)(1)]		
YES	The facility transfers oil over water to or from vessels and has a total oil storage capacity greater or equal to 42,000 gallons.	
	-OR-	
NO	The facility's total oil storage is greater than or equal to 1 million gallons, and one of the following is true:	
NO	The facility does not have secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground oil storage tank within each storage area plus sufficient freeboard to allow for precipitation.	
YES	The facility is located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments.	
NO	The facility is located at a distance such that a discharge from the facility would shut down a public drinking water intake.	
NO	The facility has had a reportable spill in an amount greater than or equal to 10,000 gallons with in the last 5 years.	
	Substantial Harm Facility	<input checked="" type="checkbox"/> Significant and Substantial Harm Facility

NOTE: The following checklist items correspond to the final regulations as outlined in 40 CFR 112.20, Appendix F. For all checklist items, indicate FRP adequacy as follows: adequately addressed (YES), deficient or not addressed (NO), or not applicable (N/A).

Facility Response Plan Plan Review Checklist

For Verifying Compliance with Facility Response Plan Requirements

Activity Information		Clean Channel Assoc 1 hr.; Garner Environ. 1 hr; National Response Corp 1hr ; Phoenix Pollution 1 hr
Activity Type	FRP Plan Review	
Reason for Review	Initial Plan Submittal (new FRP)	
	5-year Review	
	Plan Amendment (note type)	
<input checked="" type="checkbox"/> X	Other (note other reason)	
	Note: Inspection	
Activity Date		
EPA Inspector	Chris Perry	

112.20(h)(11)	A. Response Plan Cover Sheet (sec. 2.0)	YES	NO	N/A
	General Information (sec 2.1)			
	Facility name	X		
	Facility address	X		
	Facility telephone number	X		
	Mailing address (if different from facility address)	X		
	Facility owner/operator and address (recommended)	X		
	Facility owner telephone (recommended)	X		
	Dun & Bradstreet number	X		
	Longitude (degrees, minutes, seconds)	X		
	Latitude (degree, minutes, seconds)	X		
	North American Industrial Classification System (NAICS) code	X		
	Facility start up date (recommended)	X		
	Facility acres (recommended)	X		
	Name of protected waterway or environmentally sensitive area	X		
	Distance to navigable water	X		
	Worst case discharge amount (gallons)	X		
	Maximum oil storage capacity (gallons)	X		
	Largest aboveground storage tank (AST) capacity (gallons)	X		
	Total number of ASTs	X		
	Total number of underground storage tanks (USTs)			X
	Total UST storage			X
	Total storage of drums and transformers that contain oil	X		

	Number of surface impoundments and total storage of surface impoundments			X
Applicability of Substantial Harm Criteria (sec.2.2)				
	Attachment C-1 with answer to each applicability question	X		
	Documentation of reliability and analytical soundness of alternate formula	X		
Certification (sec. 2.3)				
	Plan holder certification is included (contains signature, title, and date)	X		
Verification of Contract (sec. 2.4)				
	Plan holder certification is included (contains signature, title, and date)	X		
Notes:				

112.20(h)(1)	B. Emergency Response Action Plan (ERAP) (sec. 1.1)	YES	NO	N/A
112.20(h)(1)	Separate Section of FRP	X		
112.20(h)(1)(i),	Qualified Individual (QI) Information (sec. 1.2)	X		
112.20(h)(1)(ii), 112.20(h)(3)(iii)	Emergency Notification List (sec. 1.3.1)	X		
	Spill Response Notification Form (sec. 1.3.1)	X		
112.20(h)(1)(iv)	Response Equipment List and Location (sec. 1.3.2)	X		
	Response Equipment Testing and Deployment (sec. 1.3.4)	X		
112.20(h)(1)(iv)	Facility Response Team List (sec. 1.3.4)	X		
112.20(h)(1)(v)	Evacuation Plan (sec. 1.3.5)	X		
112.20(h)(1)(vi)	Immediate Actions (sec. 1.7.1)	X		
112.20(h)(1)(viii)	Facility Diagrams (sec. 1.9)	X		
*The sections above should be extracted from the more detailed corresponding sections of the plan.				
Notes: Items marked in red are not included in this section of the plan.				

112.20(h)(2)	C. Facility Information (sec. 1.2)	YES	NO	N/A
	Facility name (sec. 1.2.1)	X		
	Street address	X		
	City, state, zip code	X		
	County	X		
	Phone number	X		
	Latitude/longitude (sec. 1.2.2)	X		
	Wellhead protection area (sec. 1.2.3)	X		
	Owner/operator (both names included, if different) (sec. 1.2.4)	X		
	QI Information (sec. 1.2.5)	X		

	-Name, position, street address, phone numbers	X		
	- Description of specific response training experience	X		
	Oil storage start-up date (sec. 1.2.6)	X		
	Facility operations description (sec. 1.2.7)	X		
	North American Industrial Classification System (NAICS) or Standard Industrial Classification code (SIC)	X		

	Dates and types of substantial expansion (sec. 1.2.8)	X		
Notes:				

112.20(h)(1) and (3)	D. Emergency Response Information (sec. 1.3)	YES	NO	N/A
	Notification (sec. 1.3.1)			
	Emergency Notification Phone List	X		
	National Response Center phone number	X		
112.20(h)(1)(i)	QI (day and evening) phone numbers	X		
	Company response team (day and evening) phone numbers	X		
	Federal On-Scene Coordinator (OSC) and/or Regional Response Center (day and evening) phone numbers	X		
	Local response team phone numbers (fire department/cooperatives)	X		
	Fire marshal (day and evening) phone numbers	X		
	State emergency response phone number(s)	X		
	State Police phone number	X		
	State Emergency Response Commission (SERC) phone number	X		
	Local emergency planning committee (LEPC) phone number	X		
	Wastewater treatment facility(s) name and phone number (recommended)	X		
	Local water supply system (day and evening) phone numbers	X		
	Weather report phone number	X		
	Local television/radio phone number(s) for evacuation notification	X		
112.20(h)(3)(i)	Spill response contractor(s)	X		
	Factories/Utilities with water intakes (recommended)			X
	Trustees of sensitive areas (recommended)			X
	Hospital phone number	X		
	Spill Response Notification Form			
	Reporter's name, position and phone number	X		
	Company information	X		
	Incident description (source/cause)	X		
	Material (were materials discharged?)	X		
	Response action (meeting federal obligations to report, calling for responsible party, time called)	X		
	Impact	X		
	Date/time of incident, incident address/location, nearest city/state/county/zip code, distance from city/units of measure/direction from city, township, range, borough, container type/tank oil storage capacity	X		
	Units of measure, facility oil storage capacity/units of measure, facility longitude and latitude	X		
Notes:				

112.20(h)(1)(iv), 112.20(h)(3)(vi)	Response Equipment (sec 1.3.2)	YES	NO	N/A
	Equipment Information			
	Equipment list	X		
	Equipment location	X		
	Release handling capabilities and limitations (e.g., launching sites)	X		
Notes:				

112.20(h)(3)(vi)	E. Response Equipment List (Identify if Facility, OSRO, CO-OP owned by letters O, F, or C) (sec. 1.3.2)	YES	NO	N/A
	Skimmers/pumps (operational status, type/model/year, number or quantity, capacity, daily effective recovery rate, storage location)	O		
2000' 18" Boom	Boom (containment boom: operational status, year, number, skirt size)	F		
27 Bags (5 per) Oil only sock boom; 40 bags of pads Polypropylene Oil Sorbent Pads; Soda Ash/grade Ash	Boom (sorbent boom: operational status, type/model/year, number, size (length))	F		
	Chemical countermeasure agents stored	O		
	Sorbents (type, year purchased, amount, storage location)	O		
	Hand tools (type, quantity, storage location)	O		
1w/ 15 Towers Alarm/PA; 50 Cellular	Communications equipment (operational status, type and year, quantity, storage location)	F		
Hand tools, various at the Fire Station on the Engine; Assorted PPE (HAZ-Mat Trailer)	Fire Fighting and Personnel Protective Equipment	F		
(Fire Station)	Boats and Motors (operational status, type, and year, quantity, storage location)	F		
10 boxes Colorimetric Tuber; 23 Multi-Gas Meters	Other (e.g., heavy equipment, cranes, dozers, etc.) (operational status, type and year, quantity, storage location)	F		
	Equipment Location	X		
	Amount of oil that emergency response equipment can handle and limitations (e.g., launching sites) must be described.	X		
Notes:				

112.20(h)(8)(i) and (ii)	F. Response Equipment Testing and Deployment Drill Log (sec. 1.3.3)	YES	NO	N/A
	Date of last inspection or equipment test	X		
	Inspection Frequency	X		
	Date of Last Deployment	X		
	Deployment Frequency	X		

	OSRO Certification (Note: Facilities without facility owned response equipment must ensure that the Oil Spill Removal Organization that is identified in the response plan to provide this response equipment certifies that the deployment exercises have been met)	X		
Notes:				

	G. Personnel (sec. 1.3.4)	YES	NO	N/A
112.20(h)(3)(v), 112.20(h)(1)(v)	Emergency Response Personnel Information (Personnel whose duties involve responding to emergencies, including oil discharges, even when they are not present at the site)			
	Response personnel name(s)	X		
	Facility response team title/position	X		
	Response personnel phone numbers (work/home, other)	X		
	Response personnel response time	X		
	Response personnel responsibility	X		
	Response personnel training (type and date)		X	
	Emergency Response Contractor Information			
112.20(h)(3)(i)	Response contractor name (s)	X		
	Response contractor phone numbers	X		
	Response contractor response time	X		
112.20(h)(3)(ii)	Response contractor evidence of contractual arrangements	X		
	Facility Response Team Information (Composed of Emergency Response Personnel and Emergency Response that will respond immediately)			
	Response team member name(s)	X	/	
	Response team member job function	X	/	
	Response team member response time	X	/	
	Response team member phone/pager number	X	/	
	Name of emergency response contractor (contractors providing facility response team services may be different than contractors providing oil spill response services)	X	/	
	- Response time	X	/	
	- Phone/pager	X	/	

Notes: items marked in red are not included in this section of the plan.

— Add Facility response team (Boon)

112.20(h)(1)(vi), 112.20(h)(3)(vii)	H. Evacuation Plans (sec. 1.3.5)	YES	NO	N/A
	Facility Evacuation Plan (sec. 1.3.5.1)			
	Location of stored materials	✓	X	
	Hazard imposed by spilled materials	✓	X	

	Spill flow direction	/	x	
	Prevailing wind directions and speed	/	x	
	Water currents, tides, or wave conditions (if applicable)		x	/
	Arrival route of emergency response personnel and response equipment	/	x	
	Evacuation routes	/	x	
	Alternative routes of evacuation	/	x	
	Transportation of injured personnel to nearest emergency medical facility		x	
	Location of alarm/notification systems	/	x	
	Centralized check-in area for roll call	/	x	
	Mitigation command center location	/	x	
	Location of shelter at facility		x	/
112.20(h)(3)(vii), 112.20(h)(1)(vi)	Community Evacuation Plans referenced (sec. 1.3.5.3)		x	

Notes: The Evacuation Plan should include a written discussion of each of the items marked in red above.

112.20(h)(3)(ix)	I. Qualified Individual's Duties (sec. 1.3.6)	YES	NO	N/A
112.20(h)(3)(ix)(A)	Activate internal alarms and hazard communication systems	x		
112.20(h)(3)(ix)(B)	Notify Response Personnel	x		
112.20(h)(3)(ix)(C)	Identify character, exact source, amount, and extent of the release	x		
112.20(h)(3)(ix)(D)	Notify and provide information to appropriate Federal, State and local authorities	x		
112.20(h)(3)(ix)(E)	Assess interaction of spilled substance with water and/or other substances stored at facility and notify on-scene response personnel of assessment	x		
112.20(h)(3)(ix)(F)	Assess possible hazards to human health and the environment	x		
112.20(h)(3)(ix)(G)	Assess and implement prompt removal actions	x		
112.20(h)(3)(ix)(H)	Coordinate rescue and response actions	x		
112.20(h)(3)(ix)(I)	Access company funding to initiate cleanup activities	x		
112.20(h)(3)(ix)(J)	Direct cleanup activities	x		

Notes:

112.20(h)(4)	J. Hazard Evaluation (sec. 1.4) (See Section II, Appendix A)	YES	NO	N/A
	Hazard Identification (sec. 1.4.1)			
	Tank Above Ground and Below Ground			
	Tanks (List Tanks by Number, Product and Shell Capacity in the space below)			
	Tank number(s)	x		
	Substance(s) stored	x		
	Quantity(s) stored	x		

	Tank type(s)/year(s) of construction	X		
	Shell capacity(s)	X		
	Failure(s)/cause(s)			X
	Surface Impoundments (SI)			
	SI Number(s)			X
	Substance(s) Stored			X
	Quantity(s) Stored			X
	Surface area(s)/year(s) of construction			X
	Maximum capacity(s)			X
	Failure(s)/cause(s)			X
	Labeled schematic drawing	X		
	Description of transfers (loading and unloading) and volume of material	X		
	Description of daily operations	X		
	Secondary containment volume(s)	X		
	Normal daily throughput of the facility	X		
Notes: Items marked in red are not included in this section of the plan.				

112.20(h)(4)	K. Vulnerability Analysis (sec. 1.4.2) (See Appendix A - Calculation of the Planning Distance)	YES	NO	N/A
Planning Distance = 15 miles	Analysis of potential effects of an oil spill on vulnerable areas. (Attachment C-III to Appendix C to this part provides a method that owners or operators shall use to determine appropriate distances from the facility to fish and wildlife and sensitive environments. Owners or operators can use a comparable formula that is considered acceptable by the Regional Administrator (RA). If a comparable formula is used, documentation of the reliability and analytical soundness of the formula must be attached to the Response Plan Cover Sheet.)			
	Water intakes (drinking, cooling or other)	X		
	Schools	X		
	Medical facilities			X
	Residential areas	X		
	Businesses	X		
	Wetlands or other sensitive environments	X		
	Fish and wildlife	X		
	Lakes and streams	X		
	Endangered flora and fauna	X		
	Recreational areas	X		
	Transportation routes (air, land, and water)	X		
	Utilities	X		
	Other applicable areas of economic importance (list below)			X
Notes:				

112.20(h)(4)	L. Analysis of the Potential for an Oil Spill (sec. 1.4.3)	YES	NO	N/A
	Description of likelihood of release occurring	X		
	Oil spill history for the life of the facility	X		
	Horizontal range of potential spill	X		
	Vulnerability to natural disaster	X		
	Tank age	X		

	Other factors (e.g., unstable soils, earthquake zones, Karst topography, etc.)	X		
Notes:				

112.20(h)(4)	M. Facility Reportable Oil Spill History Description (sec. 1.4.4)	YES	NO	N/A
	Date of discharge(s)	X		
	List of discharge causes	X		
	Material(s) discharged	/	X	
	Amount of discharges (gallons)	X		
	Amount that reached navigable waters (if applicable)	/	X	
	Effectiveness and capacity of secondary containment	/		
	Clean-up actions taken	/	X	
	Steps taken to reduce possibility of recurrence	/	X	
	Total oil storage capacity of tank(s) or impoundment(s) from which material discharged	/	X	
	Enforcement actions	/	X	
	Effectiveness of monitoring equipment	/	X	
	Description(s) of how each oil discharge was detected	/	X	
Notes: Items marked in red are included in this section of the plan.				

	N. Discharge Scenarios (sec. 1.5)	YES	NO	N/A
	Small Discharges (sec. 1.5.1) (Description of small discharges addressing facility operations and components including but not limited to (see. 1.5.1.1):			
	Loading and unloading operations		X	
	Facility maintenance operation		X	
	Facility piping		X	
	Pumping stations and sumps		X	
	Oil storage location		X	
	Vehicle refueling operations		X	
	Age and condition of facility components		X	
	Small volume discharge calculation for a facility		X	
	Facility-specific spill potential analysis		X	
	Average most probable discharge for complexes	X		
	1,000 feet of boom (1 hour deployment time)	X		
	Correct amount of boom for complexes	X		
	Oil recovery devices equal to small discharge (2 hour recovery time)	X		
	Oil storage capacity for recovered material	X		

	Scenarios Affected by the Response Efforts (sec. 1.5.1.2)			
	Size of the discharge	X		
	Proximity to down gradient wells, waterways, and drinking water intakes		X	
	Proximity to fish and wildlife and sensitive environments		X	
	Likelihood that the discharge will travel offsite (i.e., topography, drainage)		X	
	Location of the material discharged (i.e., on a concrete pad or directly on the soil)		X	
	Material discharged		X	
	Weather or aquatic conditions (i.e., river flow)		X	
	Available remediation equipment		X	
	Probability of a chain reaction of failures		X	
	Direction of discharge pathway		X	
	Medium Discharges (sec. 1.5.1) (Description of medium discharges scenarios addressing facility operations and components including but not limited to (sec. 1.5.1.1):			
	Loading and unloading operations		X	
	Facility maintenance operation		X	
	Facility piping		X	
	Pumping stations and sumps		X	
	Oil storage location		X	
	Vehicle refueling operations		X	
	Age and condition of facility components		X	
	Medium volume discharge calculation for a facility	X		
	Facility-specific spill potential analysis	X		
	Maximum most probably discharge for complexes	X		
	Oil recovery devices equal to medium discharge	X		
	Availability of sufficient quantity of boom	X		
	Oil storage capacity for recovered material	X		
	Scenarios Affected by the Response Efforts (sec. 1.5.1.2)			
	Size of the discharge	X		
	Proximity to down gradient wells, waterways, and drinking water intakes		X	
	Proximity to fish and wildlife and sensitive environments		X	
	Likelihood that the discharge will travel offsite (i.e., topography, drainage)		X	
	Location of the material discharged (i.e., on a concrete pad or directly on the soil)		X	
	Material discharged		X	
	Weather or aquatic conditions (i.e., river flow)		X	
	Available remediation equipment		X	
	Probability of a chain reaction of failures		X	
	Direction of discharge pathway		X	
Notes: Discharge scenarios are too generic. Choose one and write a mock drill from it for each case. Did not find the Scenarios Affected by the Response Efforts mentioned in the plan. Each of these listed must be written into the plan for each scenario.				

112.20(h)(5)(i)	O. Worst Case Discharge (sec. 1.5.2) (See Appendix A) (When planning for the worst case discharge response all of the factors listed in the small and medium discharge section of the response plan shall be addressed)	YES	NO	N/A
	Facility Specific Worst Case Discharge Scenario		X	
	Description of worst case discharges scenarios addressing facility operations and components including but not limited to (sec. 1.5.1.1):			
	Loading and unloading operations		X	
	Facility Maintenance Operation		X	
	Facility Piping		X	
	Pumping stations and sumps		X	
	Oil storage location		X	
	Vehicle refueling operations		X	
	Age and condition of facility components		X	
112 Appendix D	Correct Worst Case Discharge (WCD) calculation for specific type of facility	X		
	Correct WCD calculation for complexes	X		
112 Appendix E	Sufficient response resources for WCD	X		
	Sources and quantity of equipment for response to WCD	X		
	Oil storage capacity for recovered material	X		
	Scenarios Affected by the Response Efforts (sec. 1.5.1.2)			
	Size of the discharge	X		
	Proximity to down gradient wells, waterways, and drinking water intakes	X		
	Proximity to fish and wildlife and sensitive environments		X	
	Likelihood that the discharge will travel offsite (i.e., topography, drainage)		X	
	Location of the material discharged (i.e., on a concrete pad or directly on the soil)		X	
	Material discharged		X	
	Weather or aquatic conditions (i.e., river flow)		X	
	Available remediation equipment		X	
	Probability of a chain reaction of failures		X	
	Direction of discharge pathway		X	
Notes: Discharge scenarios are too generic. Choose one and write a mock drill from it for each case. Did not find the Scenarios Affected by the Response Efforts mentioned in the plan. Each of these listed must be written into the plan for each scenario.				

112.20(h)(6)	P. Discharge Detection Systems (sec. 1.6)	YES	NO	N/A
	Discharge Detection by Personnel (sec. 1.6.1)			
	Description of procedures and personnel for spill detection	X		
	Description of facility inspections	X		
	Description of initial response actions	✓	✗	

	Emergency Response Information (referenced)	✓	x	
Notes: Items marked in red are not included in this section of the plan. in plan				
Section II, 112.7(e)(5)(iii)(D), 112.7(e)(5)(iii), 112.7(e)(2)(viii), 112.7(e)(7)(v), Appendix A	Automated Discharge Detection (sec. 1.6.2)			
	Description of automatic spill detection equipment, including overfill alarms and secondary containment sensors	x		
	Description of alarm verification procedures and subsequent actions	x		
	Initial response actions	✓	x	
Notes: Items marked in red are not included in this section of the plan. in plan				

112.20(h)(7), Appendix E	Q. Plan Implementation (sec. 1.7)	YES	NO	N/A
Identification of response resources for small, medium, and worst case spills (sec. 1.7.1)				
	Description of response actions	x		
	Accessibility of proper response personnel and equipment	x		
	Emergency plans for spill response	x		
	Additional response training	x		
	Additional contracted help	x		
	Access to additional response equipment/experts	x		
	Ability to implement plan, including response training and practice drills	x		
	Temporary storage	x		
	Recommended form detailing immediate action for small, medium and Worst Case spills (sec. 1.7.1.2A) (stop the product flow, warn personnel, shut off ignition sources, initiate containment, notify NRC, notify OSC, notify (as appropriate))	x		
Notes:				
Disposal Plan (sec. 1.7.2)				
	Description of procedures for recovering, reusing, decontaminating or disposing of materials	x		
	Materials addressed in Disposal Plan (recovered product, contaminated soil, contaminated equipment and materials (including drums tank parts, valves and shovels), personnel protective equipment, decontamination solutions, absorbents, spent chemicals)	x		
	Plan prepared in accordance with any federal, state, and/or local regulations	x		
	Plan addresses permits required to transport or dispose of recovered materials		x	

Notes: Items marked in red are not included in this section of the plan.

waste Add a more detailed discussion of how all goes to onsite RCKA yard per facility procedures

Section II,
112.7(e)(1),
112.7(e)(7), Appendix
A

Containment and Drainage Planning (sec. 1.7.3)

	Description of containing/controlling a spill through drainage	X		
	Containment and drainage plan available	X		
	Available volume of containment	X		
	Drainage route from oil storage and transfer areas	X		
	Construction materials used in drainage troughs	X		
	Type and number of valves and separators in drainage system	X		
	Sump pump capacities	X		
	Containment capacities of weirs and booms and their location			X
	Other cleanup materials	X		

Notes:

	R. Self-Inspection, Training, and Meeting Logs (sec. 1.8)	YES	NO	N/A
	Facility Self-Inspection (sec. 1.8.1)			
Section II, 112.7(e)(8)	Records of tank inspections with dates (tank leaks, tank foundations, tank Piping) contained or cross-referenced in Plan or maintained electronically for five years	X		
Section II, 112.7(e)(8)	Records of secondary containment inspections with dates (dike or berm system, secondary containment, retention and drainage ponds) contained or cross-referenced in Plan or maintained electronically for five years	X		
112.20(h)(8)(i)	Response equipment inspection			
	Response equipment checklist (sec. 1.8.1.2)	X		
	Equipment inventory (item and quantity)	X		
	Storage location (time to access and respond)	X		
	Accessibility (time to access and respond)	X		
	Operational status/condition	X		
	Actual use/testing (last test date and frequency of testing)	X		
	Shelf life (present age, expected replacement date)	X		
	- Inspection date	X		
	- Inspector's signature	X		
	- Inspection records maintained for 5 years	X		
	- Response equipment inspection log (inspector, date, comments)	X		
Notes:				
	Facility Drills/Exercises (sec. 1.8.2)			
	Description of drill/exercise program based on National Preparedness for Response Exercise Program (PREP) guidelines or other comparable program	X		

	- If "no" alternative program has been approved by EPA RA (describe program below)			
	QI notification drill	X		
	Spill management team tabletop exercise	X		
	Equipment deployment exercise	X		
	Unannounced exercise	X		
	Area exercise	X		
	Description of evaluation procedures for drill program	X		
	Qualified Individual notification drill log (sec. 1.8.2.1)			
	Date, company, qualified individual, other contacted, emergency scenario, evaluation	X		
	Spill management team tabletop drill log (sec. 1.8.2.2)			
	Date, company, QI, participants, emergency scenario, evaluation, changes to be implemented, time table for implementation	X		
Notes:				
PREP Drills Are Good				
	Response Training (sec. 1.8.3)			
	Description of response training program (including topics)	X		
	Personnel response training logs (name, response training date/and number of hours, prevention training date/and number of hours)	X		
	Discharge prevention meeting logs (date, attendees)	X		
Notes:				

	S. Diagrams (sec. 1.9)	YES	NO	N/A
	Site Plan Diagram			
	Entire facility to scale	X		
	Above and below-ground storage tanks	X		
	Contents and capacities of bulk oil storage tanks	X		
	Contents and capacities of drum storage areas	X		
	Contents and capacities of surface impoundments			X
	Process buildings	X		
	Transfer areas	X		
	Location and capacity of secondary containment systems	X		
	Location of hazardous materials	X		
	Location of communications and emergency response equipment	X		
	Location of electrical equipment that might contain oil	X		
	If the facility is a complex facility, the interface between EPA and other regulating agencies	X		
Notes:				
	Site Drainage Plan Diagram			

	Major sanitary and storm sewers, manholes, and drains	X		
	Weirs and shut-off valves			X
	Surface water receiving streams	X		
	Fire fighting water sources	X		
	Other utilities	X		
	Response personnel ingress and egress	X		
	Response equipment transportation routes	X		
	Direction of spill flow from discharge points	X		
Notes:				
	Site Evacuation Plan Diagram			
	Site plan diagram with evacuation routes	X		
	Location of evacuation regrouping areas	X		
Notes:				

Section II, 112.7(e)(9)	T. Site Security (sec. 1.10)	YES	NO	N/A
	• Description of facility security	X		
	(Emergency cut-off locations, enclosures, guards and their duties, lighting, valve and pump locks, pipeline connection caps)	X		
Notes:				

Please use the following space to describe overall impressions of the facility response plan (i.e., functional, workable). A set of questions is provided in Appendix C to assist the inspector is assessing overall Plan adequacy.	
Reviewed by:	Karen A. Sterrett
Date:	3/22/2017